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MEGAN WHITE, *et al.*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

MEGAN WHITE, JERONIMO AGUILAR,
LOREN WAYNE KIDD, LYRIC NASH,
NICOLLETTE JONES, and ODETTE ZAPATA,

Plaintiffs,

v.

SACRAMENTO POLICE DEPARTMENT; THE
CITY OF SACRAMENTO; DANIEL HAHN;
and DOES 1-200 (the names and numbers of
which are currently unknown),

Defendants.

) Case No. 2:21-cv-02211-JAM-DB

)
) **STIPULATION AND REQUEST FOR**
) **RECONSIDERATION OF EXPERT**
) **DEADLINES IN AMENDED SCHEDULING**
) **ORDER**

Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil Local Rules 144(a), Plaintiffs Megan White, Jeronimo Aguilar, Loren Wayne Kidd, Lyric Nash, Nicollette Jones, and Odette Zapata (“Plaintiffs”) and Defendants the City of Sacramento, the Sacramento Police Department, and Daniel Hahn (“Defendants”), collectively “the parties”, by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on August 10, 2022, the Court issued a Pretrial Scheduling Order (Dkt. No. 34), and then amended the pretrial scheduling order on June 20, 2023 (Dkt. No. 46) and on October 23, 2023 (Dkt. No. 51).

WHEREAS, on April 17, 2024, the parties jointly stipulated to a proposed extension of all deadlines by approximately six weeks, subject to approval by the Court (Dkt No. 63).

WHEREAS, the parties sought this extension in order to complete discovery, designate expert witnesses, engage in meaningful settlement discussions and, if necessary, file and have a hearing on dispositive motions.

WHEREAS, on April 22, 2024, the Court issued an Amended Pretrial Scheduling Order (Dkt. No. 64) that set the following deadlines: discovery cut-off date on August 2, 2024, disclosure of expert(s) deadline on June 7, 2024, supplemental disclosure deadline on June 21, 2024, dispositive motion filing deadline on September 27, 2024, dispositive motion hearing on December 3, 2024 at 1:00 PM, joint mid-litigation statement filing deadline due fourteen (14) days prior to the close of discovery; joint pretrial statement filing deadline on January 16, 2025, final pretrial conference on January 24, 2025 at 10:00 AM, jury trial on March 10, 2025 at 9:00 AM.

WHEREAS, the Amended Pretrial Scheduling Order (Dkt. No. 64) sets the disclosure of expert(s) deadline two months before the discovery cut-off deadline and sets the supplemental disclosure deadline six weeks before the discovery cut-off deadline.

WHEREAS, the parties agree that it is in the best interest of the full development of the case to ensure that expert witnesses have access to all information produced during discovery prior to preparing the expert reports required by Fed. R. Civ. P. 26(a)(2)(B), and that this may not be possible under the current Amended Pretrial Scheduling Order timeline.

WHEREAS, this joint request is being made in the interests of judicial economy and in good faith and will not prejudice any party.

WHEREAS, the parties have shown good cause for the stipulated extensions pursuant to Fed. R. Civ. P. 16(b)(4), in light of the parties' diligent efforts on discovery to date and the parties' desire to participate in meaningful settlement discussions.

NOW THEREFORE, Plaintiffs and Defendants hereby stipulate, subject to the approval of this Court for good cause shown, that:

1. The deadline for parties' disclosure of expert witnesses shall be extended to August 7, 2024.
 2. The deadline for parties' disclosure of rebuttal experts shall be extended to August 21, 2024.
- All other deadlines in the Court's Amended Pretrial Scheduling Order (Dkt. No. 64) shall remain in effect.

Respectfully submitted,

Dated: April 29, 2024

SIEGEL, YEE, BRUNNER & MEHTA

/s/ Dan Siegel

DAN SIEGEL

Attorneys for Plaintiffs MEGAN WHITE, JERONIMO AGUILAR, LOREN WAYNE KIDD, LYRIC NASH, NICOLLETTE JONES, and ODETTE ZAPATA

Dated: April 29, 2024

SACRAMENTO CITY ATTORNEY

/s/ Sean D. Richmond

SEAN D. RICHMOND

Attorneys for Defendants

SACRAMENTO POLICE DEPARTMENT; THE CITY OF SACRAMENTO; DANIEL HAHN

ATTESTATION

I, Kayla Webster, attest that all other signatures listed, and on whose behalf the filing is submitted, concur in the filing's contents and have authorized the filing.

/s/ Kayla Webster

Kayla Webster

ORDER

Based on the foregoing, and GOOD CAUSE showing, IT IS HEREBY ORDERED THAT:

1. The deadline for parties' disclosure of expert witnesses shall be extended to **August 7, 2024**.
2. The deadline for parties' disclosure of rebuttal experts shall be extended to **August 21, 2024**.
3. All other deadlines set forth in the Court's Order Modifying the Pretrial Scheduling Order (ECF No. 64) shall remain in effect.
4. All other instructions contained in the August 10, 2022 Pretrial Scheduling Order (ECF No. 34) shall remain in effect.

IT IS SO ORDERED.

Dated: April 29, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE